

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	NO. 1:04-cr-10229-MLW-ALL
)	
)	
)	
V.)	
)	
)	
CARLI HOLLAND)	
)	
Defendant.)	

MOTION TO ENLARGE TIME TO FILE SENTENCING
MEMORANDUM AND SENTENCING DATE

Now comes the defendant's attorney, Walter H. Underhill, Esquire, and moves this Honorable Court to enlarge the time for him to file his sentencing memorandum and the date for sentencing as deemed necessary by this Honorable Court.

In support of this motion the defendant's attorney states that his mother passed away on December 25, 2006 and that he is unable to complete the sentencing memorandum in this matter on the scheduled date of December 28, 2006, the date of his mother's funeral.

Respectfully submitted,
CARLI HOLLAND,
Defendant,
By Counsel:

"/s/Walter H. Underhill, Esquire"
WALTER H. UNDERHILL
66 Long Wharf
Boston, Massachusetts 02109
(617) 523-5858

DATED: December 26, 2006

RULE 7.1 CERTIFICATION

Defendant's attorney has contacted AUSA James Lang, Esquire to obtain his assent. Mr. Lang is unavailable and on vacation this week. Defendant's attorney does not believe that Mr. Lang would object to the enlargement of time but may very well need additional time to file his opposition to the defendant's sentencing memorandum which will raise motions for downward departures which the Government has stated in the plea agreement it will object to when raised by the defendant.

SIGNED: /s/Walter H. Underhill, Esquire

DATE: December 26, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

SIGNED: /s/Walter H. Underhill, Esquire
WALTER H. UNDERHILL, ESQ.

DATE: December 26, 2006